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COUNSEL FOR THE AD HOC COMMITTEE OF
ASBESTOS PERSONAL INJURY CLAIMANTS

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

X

In re) Chapter 11
GENERAL MOTORS CORP., *et al.*,) Case No. 09-50026 (REG)
Debtors.) Jointly Administered

EVIDENCE AND WITNESS LIST OF THE AD HOC COMMITTEE OF PERSONAL INJURY ASBESTOS CLAIMANTS FOR THE DEBTORS' MOTION PURSANT TO 11 U.S.C. §§ 105, 363(b), (f), (k) and (m), AND 365, AND FED. R. BANKR. P. 2002, 6004, AND 6006 TO (I) APPROVE (A) THE SALE PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS, LLC, A U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS; (B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF; AND (II) SCHEDULE SALE APPROVAL HEARING

The Ad Hoc Committee of Personal Injury Asbestos Claimants (the “Asbestos Committee”), by and through their undersigned counsel, by way of evidence and

witness list for the Debtor's Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k) and (m), and 365, and FED. R. BANKR. P. 2002, 6004, and 6006 to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings, LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing (the "Sale Motion") hereby states:

I. WITNESSES

The Asbestos Committee may call as adverse witnesses Frederick Henderson, CEO of General Motors Corporation ("GM") and Harry Wilson of the U.S. Auto Task Force, live or by deposition. The Asbestos Committee reserves the right to cross-examine witnesses called live or by declaration or affidavit by the Debtors or any other party. The Asbestos Committee also reserves the right to amend or supplement this list.

II. EXHIBITS

The Asbestos Committee may use the Affidavit of Frederick Henderson [Docket No. 21] and any amendments or supplements thereto, the Master Transaction Agreement and any of the documents contained on the Debtors' exhibit list at the hearing on the Sale Motion.

The Debtors produced for receipt on June 27, 2009 hundreds of thousands of pages of documents. The Asbestos Committee reserves the right to amend or

supplement this list after its counsel has had an opportunity to complete the review of those documents.

III. DEPOSITION DESIGNATIONS

The deposition of Harry Wilson of the U.S. Auto Task Force is being conducted today. The Asbestos Committee reserves the right to designate all or portions of the transcript of that deposition.

Dated: June 29, 2009

Respectfully submitted,

**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA,
*A Professional Corporation***

By: /s/ Sander L. Esserman
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